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United States of America  
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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 DARRYL KAUFFMAN,  
15 Defendant.

CASE NO. 2:22-CR-00225 DAD  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
DATE: February 28, 2023  
TIME: 9:30 a.m.  
COURT: Hon. Dale A. Drozd

16  
17 STIPULATION

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status on February 28, 2023.  
21 2. By this stipulation, defendant now moves to continue the status conference until June 13,  
22 2023, and to exclude time between February 28, 2023, and June 13, 2023, under Local Code T4.  
23 3. The parties agree and stipulate, and request that the Court find the following:  
24 a) The government has represented that the discovery associated with this case  
25 includes state and federal investigative reports and financial records, among other items.  
Discovery is voluminous and presently encompasses over 45,000 Bates stamped items. All of  
26 this discovery has been either produced directly to counsel and/or made available for inspection  
27 and copying.  
28

1                   b)     Counsel for defendant desires additional time to review the provided discovery,  
2 consult with her client, perform investigation, and otherwise prepare the case for trial.

3                   c)     Counsel for defendant believes that failure to grant the above-requested  
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
5 into account the exercise of due diligence.

6                   d)     The government does not object to the continuance.

7                   e)     Based on the above-stated findings, the ends of justice served by continuing the  
8 case as requested outweigh the interest of the public and the defendant in a trial within the  
9 original date prescribed by the Speedy Trial Act.

10                  f)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
11 et seq., within which trial must commence, the time period of February 28, 2023 to June 13,  
12 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
14 of the Court's finding that the ends of justice served by taking such action outweigh the best  
15 interest of the public and the defendant in a speedy trial.

16       4.     Nothing in this stipulation and order shall preclude a finding that other provisions of the  
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
18 must commence.

19                  IT IS SO STIPULATED.

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21                  Dated: February 23, 2023

PHILLIP A. TALBERT  
United States Attorney

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24                  \_\_\_\_\_  
25                  /s/ HEIKO P. COPPOLA  
26                  HEIKO P. COPPOLA  
27                  Assistant United States Attorney

28                  Dated: February 23, 2023

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29                  /s/ TASHA CHALFANT  
30                  TASHA CHALFANT  
31                  Counsel for Defendant  
32                  Darryl Kauffman

## ORDER

Pursuant to the stipulation of the parties and good cause appearing, the status conference scheduled for February 28, 2023 is continued to June 13, 2023, at 9:30 a.m. and time is excluded between February 28, 2023, and June 13, 2023, under Local Code T4.

IT IS SO ORDERED.

Dated: **February 23, 2023**

Dale A. Droyd  
UNITED STATES DISTRICT JUDGE